

EXHIBIT D

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Additional counsel listed on Exhibit A

11 UNITED STATES BANKRUPTCY COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14
15 In re:
16 PG&E CORPORATION
17 - and -
18 PACIFIC GAS AND ELECTRIC COMPANY,
19 Debtors.
20

) Case No. 19-30088 (DM) (Lead Case)
) Chapter 11
) (JOINTLY ADMINISTERED)
)
) DECLARATION OF YORK COUNTY ON
) BEHALF OF THE COUNTY OF YORK
) RETIREMENT FUND IN SUPPORT OF
) SECURITIES' PLAINTIFFS' MOTION FOR
) THE APPLICATION OF BANKRUPTCY
) RULE 7023 AND THE CERTIFICATION OF
) A CLASS OF SECURITIES CLAIMANTS

- 21 ☒ Affects Both Debtors
22 ☐ Affects PG&E Corporation
23 ☐ Affects Pacific Gas and Electric Company

United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Gregory F. Bower, declare as follows:

2 1. I am the Secretary for Named Plaintiff, York County on behalf of the County of
3 York Retirement Fund ("York County"), and I am authorized to make this declaration. York
4 County is a governmental defined benefit pension plan with approximately \$577 million in assets
5 under management. I am the person at York County who is primarily responsible for monitoring
6 and directing this litigation on behalf of York County.

7 2. York County's transactions in PG&E's securities during the Class Period, and in
8 PG&E bonds prior to the petition date in bankruptcy court, are identified in the attached Exhibit
9 1; *see also* Third Amended Consolidated Class Action Complaint for Violation of the Federal
10 Securities Laws (District Court ECF No. 121) ("Complaint").

11 3. I, on behalf of York County, have monitored the progress of this litigation. I have
12 regularly conferred with Robbins Geller Rudman & Dowd LLP ("Robbins Geller" or "Securities
13 Act Counsel") concerning the litigation and overseen the efforts of Robbins Geller in prosecuting
14 the case. For example, I have received and reviewed documents filed with the Court including,
15 but not limited to, the Complaint, legal briefs related to Defendants' motions to dismiss the
16 Complaint in the District Court, legal briefs related to Debtors' objections to claims brought in
17 bankruptcy court, and the instant Motion to Certify Class, Appoint Class Representative and
18 Appoint Class Counsel. I have consulted with Robbins Geller concerning key events in the
19 litigation, including document collection and review and deposition scheduling.

20 4. York County is committed to continuing to actively direct this litigation and
21 maximize the recovery for the Class. As Named Plaintiff and proposed Class Representative, York
22 County understands that it owes fiduciary duties to all members of the Class to provide fair and
23 adequate representation and intends to continue to work with Securities Act Counsel to obtain the
24 maximum recovery possible for the entire Class consistent with good faith and meritorious
25 advocacy.

26 5. York County also intends to continue to provide fair and adequate representation
27 by, among other things, further considering the advice and further directing the efforts of Securities
28 Act Counsel and proposed Class Counsel, Robbins Geller. York County is aware that Robbins

1 Geller has substantial experience and expertise in prosecuting securities class actions and believes
2 that Robbins Geller possesses the necessary financial and human resources to prosecute the case
3 effectively.

4 6. York County will not accept any payment for serving as Class Representative
5 beyond its pro rata share of any recovery, except for reimbursement of such reasonable costs and
6 expenses (including lost wages) directly relating to the representation of the Class as ordered or
7 approved by the Court.

8 I declare under penalty of perjury that the foregoing is true and correct. Executed this 19th
9 day of December, 2024 in York, PA.

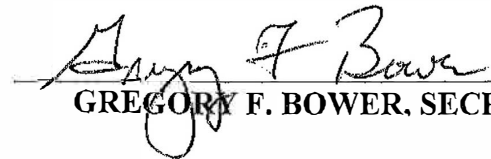
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13 GREGORY F. BOWER, SECRETARY
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EXHIBIT A
COUNSEL

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Counsel for Securities Act Plaintiffs

EXHIBIT 1

SCHEDULE A
SECURITIES TRANSACTIONS

Bond

<u>Date Acquired</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
05/03/2018	2.95% due 03/01/2026	112,000	\$92.16
05/30/2018	2.95% due 03/01/2026	212,000	\$91.95
11/27/2017	3.3% due 12/01/2027	162,000	\$99.70
11/27/2017	3.3% due 12/01/2027	162,000	\$99.99
05/14/2018 ^e	3.3% due 12/01/2027	212,000	\$92.51
<u>Date Disposed</u>	<u>Type of Debt</u>	<u>Face Amount</u>	<u>Price</u>
11/15/2018	2.95% due 03/01/2026	25,000	\$80.00
11/15/2018	2.95% due 03/01/2026	25,000	\$81.00
11/15/2018	2.95% due 03/01/2026	46,000	\$79.92
11/15/2018	2.95% due 03/01/2026	64,000	\$81.63
11/15/2018	2.95% due 03/01/2026	64,000	\$82.25
11/16/2018	2.95% due 03/01/2026	38,000	\$87.00
01/09/2019	2.95% due 03/01/2026	62,000	\$79.00
05/03/2018	3.3% due 12/01/2027	112,000	\$92.92
05/14/2018 ^e	3.3% due 12/01/2027	212,000	\$92.51
05/30/2018	3.3% due 12/01/2027	212,000	\$92.73

^eDebt exchange offer.

Prices listed are rounded up to two decimal places.